

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

CHRIS F. FIGUEROA, JR.

Criminal No.

3-23CR0070-B

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning on or about October 15, 2022, and continuing through January 28, 2023, in the Dallas Division of the Northern District of Texas and elsewhere, **CHRIS F. FIGUEROA, JR.**, the defendant, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree with other persons unknown, to commit certain offenses against the United States, to wit: to possess with the intent to distribute and to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, cocaine base, and marihuana each a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846.

Count Two

Possession with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 841(a)(1))

On or about October 15, 2022, in the Dallas Division of the Northern District of Texas, the defendant, **CHRIS F. FIGUEROA, JR.**, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine and cocaine base, each Schedule II controlled substances.

In violation of 21 U.S.C. § 841(a)(1), the penalty for which is found at 21 U.S.C. § 841(b)(1)(C).

Count Three

Unlawful Possession of a Firearm by a Convicted Felon
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about October 15, 2022, in the Dallas Division of the Northern District of Texas, **CHRIS F. FIGUEROA, JR.**, the defendant, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, a felony offense, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, to wit: (1) a Glock 19 bearing serial number MF8856 and (2) a Kahr P9 bearing serial number EA1984.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Four

Possessing a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about October 15, 2022, in the Dallas Division of the Northern District of Texas, **CHRIS F. FIGUEROA, JR.**, the defendant, in furtherance of the commission of a drug trafficking crime, namely, to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine and cocaine base, each a controlled substance, as alleged in Count Two of this indictment, did knowingly possess a firearm, to-wit: (1) a Glock 19 bearing serial number MF8856, and (2) a Kahr P9 bearing serial number EA1984.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Count Five

Possession with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 841(a)(1))

On or about January 28, 2023, in the Dallas Division of the Northern District of Texas, the defendant, **CHRIS F. FIGUEROA, JR.**, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of 21 U.S.C. § 841(a)(1), the penalty for which is found at 21 U.S.C. § 841(b)(1)(D).

Count Six

Unlawful Possession of a Firearm by a Convicted Felon
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about January 28, 2023, in the Dallas Division of the Northern District of Texas, **CHRIS F. FIGUEROA, JR.**, the defendant, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, a felony offense, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, to wit: (1) a .22 caliber, American Tactical, GSG-522, bearing serial number A521484, (2) a SKS rifle, 7.62X39 cal., bearing serial number CCCP26470, and (3) a Glock ZEV, 9 mm pistol, bearing serial number SYD915.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Seven

Possessing a Firearm in Furtherance of a Drug Trafficking Crime;
(Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about January 28, 2023, in the Dallas Division of the Northern District of Texas, **CHRIS F. FIGUEROA, JR.**, the defendant, in furtherance of the commission of a drug trafficking crime, namely, to possess with intent to distribute a mixture or substance containing a detectable amount of marihuana, a controlled substance, as alleged in Count Five of this indictment, did knowingly possess a firearm, to-wit: (1) a black .22 caliber, American Tactical, GSG-522, bearing serial number A521484, (2) a SKS rifle, 7.62X39 cal., bearing serial number CCCP26470, and (3) a Glock ZEV, 9 mm pistol, bearing serial number SYD915.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Forfeiture Notice

(21 U.S.C. § 853; 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Pursuant to 21 U.S.C. § 853(a), upon conviction of the narcotic conspiracy and/or narcotic possession counts in this Indictment, the defendant, **CHRIS F. FIGUEROA, JR.**, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of those count offenses, and any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of those count offenses, including but not limited to the following:

- (1) \$5,917.05 in United States currency.

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendant **CHRIS F. FIGUEROA, JR.**, shall forfeit to the United States any firearm and ammunition involved in or used in the willful commission of the firearm count offenses, including but not limited to the following:

- (1) a black .22 caliber, American Tactical, GSG-522, bearing serial number A521484,
- (2) a SKS rifle, 7.62X39 caliber, bearing serial number CCCP26470,
- (3) a Glock ZEV 9 mm pistol, bearing serial number SYD915,
- (4) a Glock 19 bearing serial number MF8856,
- (5) a Kahr P9 bearing serial number EA1984, and
- (6) assorted ammunition and magazines with the above weapons.

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL


FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY


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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

CHRIS F. FIGUEROA, JR.

INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Count 1)

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute a Controlled Substance
(Counts 2 and 5)

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

Unlawful Possession of a Firearm by a Convicted Felon
(Counts 3 and 6)

18 U.S.C. § 924(c)(1)(A)(i)

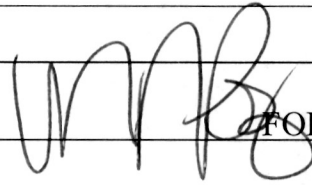
Possessing a Firearm in Furtherance of a Drug Trafficking Crime
(Counts 4 and 7)

21 U.S.C. § 853(a); 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

7 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 23 day of February, 2023.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:23-MJ-00179

Previous USDC case#: 3:15-CR-00257-L

**in the name of Chris Frank Figueroa (NO Jr.)